

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

FILED
08 APR 17 AM 10:07

UNITED STATES OF AMERICA,

Plaintiff,

v.

Bobby Eugene TURNER,

Defendant.

Magistrate Case No. **'08 MJ 1178**

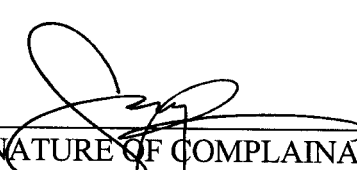
COMPLAINT FOR VIOLATION OF

Title 8, U.S.C., Section
1324(a)(2)(B)(iii)-
Bringing in Illegal Alien(s)
Without Presentation

The undersigned complainant being duly sworn states:

On or about **April 15, 2008**, within the Southern District of California, defendant **Bobby Eugene TURNER**, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, **Celsa Aracely QUIJANO-Puc**, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien, and upon arrival did not bring and present said alien immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.


SIGNATURE OF COMPLAINANT
Sara Esperagoza United States Customs
and Border Protection Enforcement Officer

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS **17th** DAY OF
April, 2008.


UNITED STATES MAGISTRATE JUDGE

PROBABLE CAUSE STATEMENT

The complainant states that **Celsa Aracely QUIJANO-Puc** is a citizen of a country other than the United States; that said alien has admitted she is deportable; that her testimony is material; that it is impracticable to secure her attendance at trial by subpoena; and that she is a material witness in relation to this criminal charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section 3144.

On April 15, 2008, at approximately 2220 hours, **Bobby Eugene TURNER (Defendant)**, applied for admission into the United States at the Otay Mesa, California Port of Entry as the driver and sole visible occupant of a maroon 1993 Jeep Cherokee. A Customs and Border Protection (CBP) Officer received two negative declarations from Defendant. The Defendant claimed he had been in Mexico to see the dentist and stated that the vehicle belonged to his girlfriend. The CBP Officer requested the vehicle registration and noticed the registration for the car was counterfeit. At this time a CBP Canine Enforcement Officer informed the primary officer that his Narcotic/Human Detector Dog (N/HDD) had alerted to the undercarriage of the vehicle. The vehicle and its occupants were subsequently escorted to secondary for further inspection.

In secondary, CBP Officers discovered one adult female concealed within a non-factory compartment in the rear bench seat of the vehicle. The compartment was constructed of sheet metal. The adult female determined to be a citizen of Mexico without entitlements to enter the United States and is now identified as: **Celsa Aracely QUIJANO-Puc (Material Witness)**.

During a videotaped proceeding, Defendant was advised of his Miranda rights and elected to submit to questioning without benefit to counsel. Defendant admitted to knowledge of the concealed individual. Defendant admitted he was driving the vehicle in exchange for \$500.00 USD. Defendant stated he instructed to drive the vehicle to "E Street" in Chula Vista, California where he was to meet someone who would take custody of the vehicle and pay him the \$500.00 USD.

On a separate videotaped interview, Material Witness admitted she is a citizen of Mexico without legal rights to enter the United States. Material Witness stated her family was going to pay an unknown amount for her to be smuggled into the United States. Material Witness stated she was en route to Denver, Colorado to seek residency and employment.